REMARKS

The Office Action dated September 30, 2008 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1, 10, 13, 14, 17, 18, 21, 22, 25 and 26 have been amended to more particularly point out and distinctly claim the subject matter of the invention. No new matter has been added and no new issues are raised which require further consideration or search. Claims 1-5 and 10-26 are currently pending.

Applicants wish to thank the Examiner for the courtesies extended during the telephonic interview of December 18, 2008. Applicants submit that all currently pending claims are in condition for allowance.

Claims 10, 12-14, 16 and 25 were rejected under 35 U.S.C. § 102(e) as being unpatentable over U.S. Patent No. 6,466,984 to Naveh. The Office Action alleged that Naveh discloses all of the features recited in the claims. This rejection is respectfully traversed for at least the following reasons.

Claim 10, upon which claims 11 and 12 are dependent, recites an apparatus that includes a controller configured to administrate multi-radio access mobile networks to control a behavior of said multi-radio access mobile networks. An information model is implemented in the controller which describes different Quality-of-Service mechanisms including attributes which are involved in each function under policy to represent manageable parameters of specific network implementations. The functions under policy

include admission control for new radio access bearers and radio bearers. A processor configured to form a set of policy rules based on the information model. The set of rules defines actions to be executed in dependency of an occurrence of conditions.

Claim 13 recites an apparatus that includes administrating means for administrating multi-radio access mobile networks for controlling a behavior of the multi-radio access mobile networks. The apparatus also includes implementing means for implementing an information model which describes different Quality-of-Service mechanisms including attributes which are involved in each function under policy to represent manageable parameters of specific network implementations. The functions under policy include admission control for new radio access bearers and radio bearers. The apparatus also includes processing means for forming a set of policy rules based on said information model. The set of rules defines actions to be executed in dependency of an occurrence of conditions.

Claim 14, upon which claims 15 and 16 are dependent, recite a method that includes administrating multi-radio access mobile networks by a controller configured to control a behavior of said multi-radio access mobile networks. The method also include implementing an information model which describes different Quality-of-Service mechanisms including attributes which are involved in each function under policy to represent manageable parameters of specific network implementations. The functions under policy include admission control for new radio access bearers and radio bearers.

The method also includes forming a set of policy rules using said information model to define actions to be executed in dependency of an occurrence of conditions.

As will be discussed below, the disclosure of Naveh fail to disclose or suggest all of the elements of the claims, and therefore fails to provide the features discussed above. The rejection is respectfully traversed for at least the following reasons.

Naveh generally describes a method and apparatus for policy-based management of quality of service treatments of network data traffic flows by integrating policies with application programs are described. The method involves creating one or more mappings, each mapping representing an abstract policy and associating a pre-determined network quality of service with a traffic flow type of the flow of information and with an application program. See column 5, lines 25-30.

The method also includes determining one or more processing policies, which include creating and storing one or more policy statements in a repository. See column 6, lines 9-15. Each policy statement is represented by a plurality of nodes that represent a condition of one of the traffic flows, an operator, an operand, and an action comprising one of the quality of service treatments.

Naveh does not disclose "wherein functions under policy include admission control for new radio access bearers and radio bearers", as recited, in part, in independent claim 1 and similarly recited in independent claims 1, 10, 13, 14, 17, 18, 21, 22, 25 and 26. At best, Naveh is directed to policy control for bandwidth management. See column 3, lines 45-55. A service level agreement is used to dictate the maximum bandwidth

allowed by certain users. A maximum allotted bandwidth is disclosed as being 1Mb/s. There is no disclosure anywhere in Naveh of having a policy control function that controls admissions for new radio access bearers.

Therefore, a Naveh fails to disclose or suggest all the features recited in independent claims 10, 13, 14 and 25. It respectfully requested that those claims dependent thereon also be allowed. Withdrawal of the rejection of claims 10, 12-14, 16 and 25 is kindly requested.

Claims 1, 2, 4, 17, 18, 21 and 26 were rejected under 35 U.S.C. § 103 as being unpatentable over U.S. Patent No. 6,466,984 to Naveh in view of Blight, "Policy-based networking architecture for QoS interworking in IP management-scalable architecture for large scale enterprise-public interoperation." The Office Action took the position that Naveh and Blight describe all the recitations of independent claims 1, 17 and 26 and related dependent claims. In particular, the Office Action alleged that Naveh discloses all of the features of the claims except for a translating function included in the policy server. The Office Action then relied on Blight as allegedly curing these admitted deficiencies of Naveh. This rejection is traversed and reconsideration is requested.

Claim 1, upon which claims 2-5 depend, recites a system, including a controller configured to administrate multi-radio access mobile networks and to control a behavior of the multi-radio access mobile networks. An information model is implemented in the controller which describes different Quality-of-Service mechanisms including attributes which are involved in each function under policy to represent manageable parameters of

specific network implementations. Functions under policy include admission control for new radio access bearers and radio bearers. The system further includes a processor configured to form a set of policy rules based on the information model. The set of rules defines actions to be executed in dependency of an occurrence of conditions. The system includes a policy based management device configured to receive the set of rules for the implementation thereof. The device includes a plurality of policy based radio resource management devices each configured to respectively manage the parameters of specific network implementations, and a translation function device configured to translate the rules into a form executable by the plurality of policy based radio resource management devices.

Claim 17 recites a system that includes controlling means for administrating multi-radio access mobile networks and for controlling a behavior of multi-radio access mobile networks. An information model is implemented in the control center means which describes different Quality-of-Service mechanisms including attributes which are involved in each function under policy for representing manageable parameters of specific network implementations. The functions under policy include admission control for new radio access bearers and radio bearers. The system also includes processing means for forming a set of policy rules based on said information model. The set of rules defines actions to be executed in dependency of an occurrence of conditions. The system also includes policy based management device means for receiving said set of rules for the implementation thereof. The policy based management device means have a plurality

of policy based radio resource management means each for respectively managing said parameters of specific network implementations. The system also includes a translation function means for translating the set of rules into a form executable by said plurality of policy based radio resource management means.

Claim 18, upon which claims 19 and 20 are dependent, recites an apparatus that includes a receiver configured to receive a set of rules defining actions to be executed in dependency of an occurrence of conditions. The apparatus also includes a processor configured to implement the set of rules. The apparatus also includes a plurality of controllers configured to perform policy based radio resource management and to respectively manage parameters of specific network implementations which concern functions including admission control for new radio access bearers and radio bearers. The apparatus also includes a translator configured to translate the rules into a form executable by the plurality of controller.

Claim 21 recites an apparatus that includes means-plus-function recitations that are similar to the features recited in apparatus claim 20. Claim 26 recites a computer program that is comparable to the method operations recited in method claim 22.

As will be discussed below, Naveh and Blight, whether considered alone or in combination, fail to disclose or suggest the elements of any of the presently pending claims, and therefore fail to provide the advantages and features discussed above.

Naveh is discussed above, Blight describes a QoS interworking in IP management, in light of scalability analysis of large-scale interworking of policy based networking

(PBNs). Blight, does not cure the deficiencies of Naveh. While Blight generally discusses an application including an information model, no description or suggestion can be found in Blight that provides that the information model includes "wherein functions under policy include admission control for new radio access bearers and radio bearers", as recited, in part, in independent claim 1 and similarly recited in independent claims 1, 10, 13, 14, 17, 18, 21, 22, 25 and 26.

Accordingly, based on the descriptions of Naveh and Blight, a person skill in the art would not be able to achieve the specific features and effect provided by the present invention. Specifically, the combination of Naveh and Blight would not provide a general policy based QoS management in multi-radio access mobile network systems, and would not be able to achieve an information model in which functions under policy include admission control for new radio access bearers and radio bearers.

Therefore, a combination of Naveh and Blight fails to teach or suggest all the features recited in independent claims 1, 17, 18, 21 and 26. By virtue of dependency, all of the claims dependent thereon are also allowable. For similar reasons, it is respectfully requested that the rejection of claims 1, 2, 4, 17, 18, 21 and 26 be withdrawn.

Claims 3 and 5 were rejected under 35 U.S.C. § 103 as being unpatentable over Naveh in view of Blight and further in view of U.S. Patent No. 7,082,102 to Wright ("Wright"). The Office Action took the position that Naveh, Blight, and Wright describe all the recitations of claims 3 and 5. This rejection is traversed and reconsideration is requested.

Dependent claims 3 and 5 depend from independent claim 1. Because the combination of Naveh, Blight, and Wright must teach, individually or combined, all the recitations of the base claim and any intervening claims of dependent claims 3 and 5, the arguments presented above supporting the patentability of independent claim 1 over Naveh and Blight are incorporated herein.

Wright generally describes systems and methods for policy-based management of a multiprotocol label switching network. In Wright, a system includes a policy-based network administration system, and the policy-based network administration system includes a plurality of policies. The system also includes an MPLS network, which is coupled to the policy-based network administration system.

Similarly to Naveh and Blight, Wright fails to disclose or suggest, at least, "an information model is implemented in said controller which describes different Quality-of-Service mechanisms including attributes which are involved in each function under policy to represent manageable parameters of specific network implementations, wherein functions under policy include admission control for new radio access bearers and radio bearers," as recited in independent claim 1. Wright does not introduce or convey the particular features of the information model, plurality of policy based radio resource management devices, and the translation function device of independent claim 1. Rather, plurality of policies in Wright do not include functions include admission control for new radio access bearers and radio bearers, as in independent claim 1. The combination of

Naveh, Blight, and Wright would not teach or suggest the particular claimed features of independent claim 1.

Therefore, Applicant respectfully submits that the 35 U.S.C. 103 rejection based on Naveh, Blight, and Wright is improper as these references do not teach or suggest each of the elements of independent claim 1 and related dependent claims 3 and 5. It respectfully requested that independent claim 1 and related dependent claims 3 and 5 be allowed.

Claims 11, 19, 20, 23 and 24 were rejected under 35 U.S.C. § 103 as being unpatentable over Naveh in view Wright. The Office Action took the position that Naveh and Wright describe all the recitations of claims 11, 19, 20, 23 and 24. This rejection is traversed and reconsideration is requested.

Dependent claims 11, 19, 20, 23 and 24 depend from independent claims 10, 18 and 22. Because the combination of Naveh and Wright must teach, individually or combined, all the recitations of the base claim and any intervening claims of dependent claims 11, 19, 20, 23 and 24, the arguments presented above supporting the patentability of independent claims 10, 18 and 22 over Naveh and Wright are incorporated herein.

Wright generally describes systems and methods for policy-based management of a multiprotocol label switching network. In Wright, a system includes a policy-based network administration system, and the policy-based network administration system includes a plurality of policies. The system also includes an MPLS network, which is coupled to the policy-based network administration system.

Similarly to Naveh, Wright fails to disclose or suggest, at least, "an information model is implemented in said controller which describes different Quality-of-Service mechanisms including attributes which are involved in each function under policy to represent manageable parameters of specific network implementations, wherein functions under policy include admission control for new radio access bearers and radio bearers," as recited in independent claim 1 and similarly in independent claims 18 and 22. Wright does not introduce or convey the particular features of the information model, plurality of policy based radio resource management devices, and the translation function device of independent claim 1. Rather, a plurality of policies in Wright do not include functions include admission control for new radio access bearers and radio bearers, as in independent claims 1, 18 and 22. The combination of Naveh and Wright would not teach or suggest the particular claimed features of independent claim 1, 18 and 22.

Therefore, Applicant respectfully submits that the 35 U.S.C. 103 rejection based on Naveh, Blight, and Wright is improper as these references do not teach or suggest each of the elements of independent claim 1 and related dependent claims 11, 19, 20, 23 and 24. It respectfully requested that independent claim 1 and related dependent claims 11, 19, 20, 23 and 24 be allowed.

In view of the above, Applicants respectfully submit that the claimed invention recites subject matter which is neither disclosed nor suggested in the cited prior art. Applicants further submit that the subject matter is more than sufficient to render the claimed invention unobvious to a person of skill in the art. Applicants therefore

respectfully request that each of claims 1-5 and 10-26 be found allowable and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

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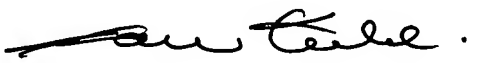

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